

Message

From: Parent, Stephanie@ARB [stephanie.parent@arb.ca.gov]
Sent: 5/3/2019 6:34:47 PM
To: LEVIN, NANCY [Levin.Nancy@epa.gov]
Subject: FW: San Diego SIP Planning
Attachments: 2. SCAQMD 2017 PM2.5 Milestone Report.pdf; U.S. EPA California QM determination letter 09-13-2018.pdf

Here you go re: RACT SIP info.

Steph



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The climate change challenge facing us is real. For a list of simple actions you can take to reduce your environmental impact, visit www.CoolCalifornia.org.

From: Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>
Sent: Tuesday, April 09, 2019 10:45 AM
To: Kelly.Johnj@epamail.epa.gov
Cc: Parent, Stephanie@ARB <stephanie.parent@arb.ca.gov>; Vanderspek, Sylvia@ARB <Sylvia.Vanderspek@arb.ca.gov>; Lee, Anita <Lee.Anita@epa.gov>; Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>
Subject: San Diego SIP Planning

Hi John,

I was looking into some of the discussion items on our call with San Diego last Friday and I wanted to update you on what I found.

1. RACT SIPs and rules: I did find references to districts mentioning that they will have completed adopting all their rules by the end of the year that they submitted their RACT SIP, and of course, instances where U.S. EPA did a conditional approval of a RACT SIP. However, you are correct that the Act and rule language refers to extra time given for "implementation" of the required measures.
2. Milestone Compliance Demonstrations: Attached is the demonstration done recently for South Coast PM2.5. We worked with Region 9 staff as the district developed this document. And, I have attached the letter from U.S. EPA determining that it was adequate. Here is the language from the report that explains how the report determined the milestones were met because the District demonstrated that key rules that contributed to RFP were implemented in the appropriate timeframe.

“Clean Air Act Section 189(c)(2) further requires that, within 90 days of each milestone, each affected state must submit a demonstration that all measures have been implemented according to the approved RFP plan and that the quantitative milestone has been met. The 2016 Air Quality Management Plan (AQMP) Appendix VI-C (Table VI-C-3A) quantified the emission reductions required to demonstrate RFP between the 2012 base year and the 2019 attainment year. As indicated in the 2016 AQMP, in the 2017 milestone year, RFP could be achieved based on baseline emissions. Baseline emissions incorporate emission reductions generated from control measures that are already adopted as well as growth factor projected for each sector. The rules and regulations that contribute to the change in baseline emissions between 2012 and 2017 were identified in the 2016 AQMP Appendix VI for stationary sources (Table VI-C-4) and for mobile and area sources (Attachment VI-C-1). The tracking of these quantitative milestones, as identified in the 2016 AQMP, is needed to ensure that the RFP targets are met.

The objective of this quantitative milestone report is to demonstrate that the SCAQMD has reviewed its commitments in the 2016 AQMP, has verified that the emissions reductions needed to demonstrate RFP have been achieved, and that ongoing progress is being made to meet the 2019 attainment date.”

3. Contingency Measures: here is the relevant language from the recent SJV Ozone Plan approval [83 FR 11198](#) regarding the contingency package that states that an area does not have to have local measures with triggers that achieve the full one-year's worth of reductions.

“As to whether the 1-tpd of emissions reductions from the contingency measures would provide for sufficient continued progress in the event of a failure to achieve an RFP milestone or failure to attain, we reviewed the documentation provided in the 2018 SIP Update of “surplus” (*i.e.*, those over and above the emissions reductions necessary to demonstrate RFP in the San Joaquin Valley nonattainment area) reductions from CARB's already-adopted mobile source control program in the RFP milestone years and the year-over-year emissions reductions expected in the year following the attainment year. For the San Joaquin Valley nonattainment area, CARB's estimates of “surplus” reductions in the various RFP milestones years (ranging from 92.4 tpd to 157.4 tpd) provide the factual basis for us to conclude that the to-be-adopted District contingency measure need not in itself achieve one year's worth of RFP. The 1 tpd reduction from the contingency measures would be sufficient even though it is far less than 11.4 tpd (*i.e.*, one year's worth of RFP) because already-implemented measures (although not relied upon for the purposes of meeting the statutory contingency measure requirement) will also ensure sufficient continued progress in the event of a failure to achieve an RFP milestone.”

Can you look into this with folks on your side and see what you think? I'd like to get the district moving in the correct direction on these even if we don't know all the specifics yet.

Thanks,
Carol



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